

Dear Sirs,

Indian Hills Neighborhood Association (IHNA) is an organization of homeowners on Lake Eufaula (Walter F George). We appreciate the opportunity to provide the following comments to the Alabama Water Agencies Working Group concerning water management issues in Alabama.

1. IHNA heartily supports Governor Bentley's efforts toward developing a statewide water management plan. For an issue as important as water policy we find it concerning that Alabama is behind our surrounding states in having a legislatively approved water policy; however, we ask that we use our lack of progressively and build on the lessons learned from those who have preceded us.
2. We strongly support water management by river basin (e.g. ACT, ACF) and not by geopolitical boundaries. It is vitally important to utilize unique basin stakeholder input to determine what issues exist in that basin, how to analyze and prioritize the issues and to determine appropriate solutions. Since almost every basin in Alabama extends into a surrounding state (i.e. Georgia for the ACT and ACF) our policies must consider working cooperatively with stakeholders in these states.
3. Whenever possible the water management plan should seek to utilize individual volunteers and private and non-profit organizations to help achieve the basin goals. For example basin stakeholder groups (such as the Apalachicola-Chattahoochee-Flint stakeholders) should be used to identify basin issues, prioritize them determine action plans. Other groups such as Alabama Water Watch can be used for water quality monitoring or Renew Our Rivers for stream lake clean up. This will allow maximizing water policy actions while minimizing costs.
4. The water management plan must establish a means of reliable sustained funding. Funding can not be let to a discretionary state budget line item. Strong consideration should be given to a tiered water use fee such as that levied in Florida for funding.
5. Science based tools must be used to facilitate basin management groups in determining root causes for issues in their basins and to allow for determination of potential solutions. These tools include but are not limited to hydrologic modeling, instream flow analysis and ground water-surface water interaction models. In addition, the water management plan should promote and even require low cost technology such as flow monitors to help acquire critical data such as consumptive use needed for analysis.
6. The water management plan must consider land management practices that directly and indirectly impact water quantity and quality.
7. Finally, the plan must have teeth. The legislation has to encompass monitoring and enforcement with substantial penalties for not meeting requirements such as drought controls, agriculture pumping permits, or water quality limits.

Very Respectfully,

Brad Moore

President, IHNA